

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

BOARD OF PARK COMMISSIONERS OF	:	
THE CLEVELAND METROPOLITAN	:	
PARK DISTRICT,	:	Case No. 1:21-cv-1284
Plaintiff,	:	
	:	Judge James S. Gwin
v.	:	
	:	
ZOOLOGICAL SOCIETY OF PITTSBURGH	:	JURY TRIAL DEMANDED
a/k/a PITTSBURGH ZOO & PPG	:	
AQUARIUM,	:	
Defendant.	:	

MOTION FOR ADMISSION PRO HAC VICE OF SHANE D. VALENZI

NOW COMES Shane D. Valenzi, Esquire, one of the attorneys for Defendant Zoological Society of Pittsburgh a/k/a Pittsburgh Zoo & PPG Aquarium (“Pittsburgh Zoo”), and pursuant to Local Rule 83.5(h) of the Local Rules of the United States District Court for the Northern District of Ohio, hereby moves this Honorable Court for an Order allowing Shane D. Valenzi, Esquire to practice before this Court *pro hac vice* in the above-captioned case on behalf of the Pittsburgh Zoo. In support thereof, I state as follows:

1. I am an attorney at law, duly licensed and practicing in the Commonwealth of Pennsylvania. I am admitted to practice in the courts of the Commonwealth of Pennsylvania (Bar I.D. No. 322025, admitted 2016) and the State of Illinois (Bar No. 6314178, admitted 2013), as well as the United States District Court for the Western District of Pennsylvania (admitted 2017), the United States District Court for the Northern District of Illinois (admitted 2014), and the United States District Court for the Western District of Michigan (admitted 2018). I am not now, and have not been, under any order of discipline by any disciplinary board and presently am a member in good standing of the courts referenced above. Attached hereto is a Declaration made under the

penalty of perjury pursuant to 28 U.S.C. § 1746 swearing to my good standing in the courts referenced above.

2. I am a lawyer in the law firm of Eckert Seamans Cherin & Mellott, LLC, and my contact information is as follows:

Shane D. Valenzi
Eckert Seamans Cherin & Mellott, LLC
44th Floor, 600 Grant Street
Pittsburgh, PA 15219
(412) 566-6186
Fax: (412) 566-6099
svalenzi@eckertseamans.com
PA Bar Registration No. 322025

3. As to matters arising during or pertaining to the above-entitled action, I hereby agree to be bound by the ethical standards of the Ohio Rules of Professional Conduct, in accordance with Local Rule 83.5 of the Local Rules of the United States District Court for the Northern District of Ohio, and represent that I am of good moral and professional character and, if required, I will swear or affirm that I will demean himself as an attorney and counselor of this Court uprightly and according to law, and that I will support and defend the Constitution of the United States.

WHEREFORE, it is respectfully requested that Shane D. Valenzi be permitted to practice *pro hac vice* before this Honorable Court during the pendency of this action.

Respectfully submitted,

/s/ Shane D. Valenzi
Shane D. Valenzi, Esquire
PA I.D. No. 322025
svalenzi@eckertseamans.com

Eckert Seamans Cherin & Mellott, LLC

44th Floor, 600 Grant Street
Pittsburgh, PA 15219
(412) 566-6049
Fax: (412) 566-6099

Attorneys for Defendant
Zoological Society of Pittsburgh a/k/a
Pittsburgh Zoo & PPG Aquarium

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Dated: July 5, 2021

CERTIFICATE OF SERVICE

I hereby certify that on July 5, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system.

/s/ Shane D. Valenzi

Shane D. Valenzi, Esquire